

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ARNOLD PEOPLES and J.P., by her )  
father and next friend, )  
ARNOLD PEOPLES, )  
 )  
Plaintiffs, )  
 )  
v. ) Case No: 1:19-cv-00568  
 )  
OSWEGO COMMUNITY SCHOOL )  
DISTRICT, DINAH MEYERS, TIFFANI )  
SIMMONS, CHRISTINE NELSON, and )  
ALEX GONZALEZ, )  
 )  
Defendants. )

(imaging, test results, insurance documents, notes, labs, correspondence, pathology, etc.) pertaining to Plaintiffs.

4. Both the prosecution and defense of this case will require that the Parties, their attorneys, their attorneys' agents, consultants and various witnesses and other personnel receive and review copies of the PHI pertaining to Plaintiffs, which is in the treating providers' possession.

WHEREFORE, the Defendants respectfully requests that this Court enter the proposed order permitting the use and disclosure of PHI created or received by any covered entity that has provided health care to Plaintiffs for any purpose connected with the pending litigation.

**OTTOSEN DINOLFO HASENBALG & CASTALDO, LTD.**

/s/ Stephen H. DiNolfo

Attorney for Defendants Oswego Community  
School District, Meyers, Simmons, Nelson, and  
Gonzalez

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